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## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

SAMANTHA JENKINS, EDWARD BROWN, 🛚	)
KEILEE FANT, BYEON WELLS, MELDON	)
MOFFIT, ALLISON NELSON, HERBERT	)
NELSON, JR., and TONYA DEBERRY, et al.	
	) Civil Action No.: 4:15-CV-00252-CEJ
Plaintiffs,	
v.	, )
THE CITY OF JENNINGS,	
	)
Defendant.	

# JOINT MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

The Parties, by and through their undersigned counsel, respectfully move this Court for an Order preliminarily approving the terms of a proposed class action settlement; approving the form and method of providing notice of the settlement to the class; and scheduling a final hearing regarding the settlement. In support of this Motion, the parties aver as follows:

- After negotiations, the Parties have reached a proposed settlement of this putative class
  action. On or about July 6, 2016, the Parties executed a Class Action Settlement
  Agreement ("Settlement Agreement" or "Settlement"), a copy of which is attached
  hereto as Exhibit 1.
- 2. Consistent with the Memorandum of Law filed herewith, the Parties respectfully request that the Court sign the proposed Order preliminarily approving the terms of a proposed class action settlement, approving the form and method of providing notice of the settlement to the class; and scheduling a final hearing regarding the settlement.

WHEREFORE, the Parties hereby move this Court for an Order (1) preliminarily approving the terms of a proposed class action settlement; (2) provisionally concluding that the proposed Class meets the requirements for certification under Rule 23 of the Federal Rules of Civil Procedure, for settlement purposes only; (3) approving the form and method of providing notice of the Settlement to the Class as set forth in the Settlement Agreement, and directing that said form of notice be provided to Class Members in that manner; and (4) scheduling a Final Settlement Hearing at which the request for final approval of the proposed Settlement, Plaintiff's Counsel's application for an award of attorneys' fees and costs, and for the entry of the Final Judgment and Order will be considered. A proposed Order Preliminarily Approving the Class Settlement, Directing the Issuance of Notice to the Class and Scheduling a Settlement Hearing is attached to the Settlement Agreement as Exhibit D.

Respectfully submitted,

/s/ Thomas B. Harvey

Thomas B. Harvey (MBE #61734)

/s/ Michael-John Voss

Michael-John Voss (MBE #61742)

/s/ Blake A. Strode

Blake A. Strode (MBE #68422) ArchCity Defenders 1210 Locust St., 2<sup>nd</sup> Floor St. Louis, MO 63103 (855) 724-2489

/s/ Alec Karakatsanis

Alec Karakatsanis (E.D. Mo.Bar No. 999294 DC) Equal Justice Under Law 916 G Street, NW Suite 701 Washington, D.C. 20001 (202) 681-2409 alec@equaljusticeunderlaw.org

## /s/ John J. Ammann

John J. Ammann (MBE #34308)

## /s/ Stephen Hanlon

Stephen Hanlon (MBE #19340)

## /s/ Brendan Roediger

Brendan Roediger (E.D.Mo. Bar No. IL 6287213)
Saint Louis University School of Law
100 N. Tucker Blvd.
St. Louis, MO 63101-1930
(314) 977-2778
broedige@slu.edu
Attorneys for Plaintiffs and the Class

## /s/ D. Keith Henson

D. Keith Henson, #31988MO
Paule, Camazine & Blumenthal, P.C.
165 North Meramec Ave., Suite 110
Clayton, MO 63105
(314) 727-2266
khenson@pcblawfirm.com
Attorney for Defendant The City of Jennings